

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

FILED

Jan 25 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. 4:21-cr-00031-JSW
12 Plaintiff,)
13 v.) VIOLATIONS:
14 SCOTT LONG,) 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2) – Accessing
15 Defendant.) Child Pornography with Intent to View;
16) 18 U.S.C. § 2253(a) – Criminal Forfeiture
17) OAKLAND VENUE
18)

19 I N F O R M A T I O N

20 The United States Attorney charges:

21 COUNT ONE: (18 U.S.C. §§ 2252(a)(4)(B) and (b)(2) – Accessing Child Pornography with
22 Intent to View)

23 On or about June 25, 2020, in the Northern District of California, the defendant,
24 SCOTT LONG,
25 did knowingly access with intent to view at least one matter which contained any visual depiction that
26 had been shipped and transported using a means and facility of interstate and foreign commerce, the
27 production of which visual depiction involved the use of a prepubescent minor engaging in sexually
28 explicit conduct, which visual depiction was of such conduct, all in violation of Title 18, United States

INFORMATION

Code, Sections 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION: (18 U.S.C. § 2253(a))

The allegations contained in this Information are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in this Indictment, the defendant,

SCOTT LONG,

shall forfeit to the United States of America:

- a. any visual depiction described in Title 18, United States Code, Sections 2251 or 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to:

- a. One Apple iMac, seized on November 20, 2020.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

1 All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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4 DATED: January 25, 2021.

DAVID L. ANDERSON
United States Attorney

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7 *Samantha Schott Bennett*
8 SAMANTHA SCHOTT BEENETT
9 Assistant United States Attorney
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CRIMINAL COVER SHEET

FILED

Jan 25 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. SCOTT LONG

CASE NUMBER:

CR 4:21-cr-00031-JSW

Is This Case Under Seal?

Yes

No ☒

Total Number of Defendants:

1 ☒

2-7

8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No ☒

Venue (Per Crim. L.R. 18-1):

SF

OAK ☒ SJ

Is this a potential high-cost case?

Yes

No ☒

Is any defendant charged with a death-penalty-eligible crime?

Yes

No ☒

Is this a RICO Act gang case?

Yes

No ☒

Assigned AUSA

(Lead Attorney): SAMANTHA SCHOTT BENNETT

Date Submitted: 1/25/2021

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 2252(a)(4)(B) - Accessing Child Pornography with
the Intent to View

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Maximum 20 years' imprisonment; Maximum fine \$250,000;
Mandatory minimum 5 year, maximum lifetime supervised release;
\$5100 special assessment (\$100 if indigent), additional special
assessment up to \$17,000 under 18 U.S.C. § 2259A; restitution;
forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ SCOTT LONG

DISTRICT COURT NUMBER

4:21-cr-00031-JSW

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OAKLAND

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court,
give name of court

☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a
pending case involving this same
defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

Name and Office of Person
Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
Attorney (if assigned) Samantha Schott Bennett

DEFENDANT**IS NOT IN CUSTODY**

1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior
summons was served on above charges ▶

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ No

If "Yes"
give date
filed

**DATE OF
ARREST** ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY** ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: